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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

United States of America,) Case No.: 2:13-cr-0160 MCE
)
Plaintiff,) <u>STIPULATION REGARDING EXCLUDABLE TIME</u>
) <u>PERIODS UNDER SPEEDY TRIAL ACT; FINDINGS</u>
vs.) <u>AND ORDER THEREON</u>
)
) Court: Hon. Morrison C. England
) Time: 9:00 a.m.
Sakhanskiy, et. al.,) Date: July 11, 2013
)
Defendants.	

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through their counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on June 6, 2013.

2. By this stipulation, defendants now moves to continue the status conference until July 11, 2013 and to exclude time between June 6, 2013 and July 11, 2013 under Local Code T4. Plaintiff does not oppose this request.

3. The parties agree and stipulate, and request that the Court find the following:

a. The government has represented that the discovery associated with this case includes over 6,000 pages including investigative reports and related documents in electronic form, over 3 hours of audiotaped interviews with Sac Metro fire investigators and local law enforcement and other witnesses and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

c. Counsel for defendant believes that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original date prescribed by the Speedy Trial Act.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: June 3, 2013

/s/ Shari Rusk
Shari Rusk
Attorney for Defendant
Larisa Sakhanskiy


/s/ Michael Anderson
Michael Anderson
Assistant United States Attorney

ORDER

In accordance with the foregoing stipulation of the parties, and good cause appearing, the status conference in this matter is hereby continued from June 6, 2013 to July 11, 2013 at 9:00 a.m.

IT IS SO ORDERED.

DATED: June 4, 2013



MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT